

VERCRUYSSSE MURRAY & CALZONE PC

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Attorneys for Unique Fabricating, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

GENERAL MOTORS CORP., *et al.*,

Case No. 09-50026 (REG)
(Jointly Administered)

Debtors.

**LIMITED OBJECTION OF UNIQUE FABRICATING, INC.
TO THE NOTICE OF (I) DEBTORS' INTENT TO ASSUME AND
ASSIGN CERTAIN EXECUTORY CONTRACTS, UNEXPIRED LEASES
OF PERSONAL PROPERTY, AND UNEXPIRED LEASES
OF NONRESIDENTIAL REAL PROPERTY AND
(II) CURE AMOUNTS RELATED THERETO**

Unique Fabricating, Inc. ("Unique"), by its undersigned counsel, hereby objects on a limited basis ("Objection") to the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto dated June 6, 2009 ("Notice"). Unique objects to the Notice because it does not accurately state the Cure Amount¹ due to UNIQUE. In further support of its Objection, Unique respectfully states as follows:

¹ Capitalized terms not expressly defined herein have the meaning ascribed to them in the Notice.

Background

1. On June 1, 2009 ("Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code ("Bankruptcy Code").

2. On June 1, 2009, GM also filed a motion seeking an order approving bidding procedures to sell substantially all of its assets, which included a procedure for the Debtors' assumption and assignment of executory contracts (Docket No. 92) ("Procedures Motion").

3. On June 2, 2009, the Court granted the Procedures Motion with respect to the sale procedures, including the procedure for assuming and assigning contracts to Vehicle Acquisition Holdings LLC ("VAH") or the ultimate purchaser of the Debtors' assets (Docket No. 274) ("Procedures Order"), which provided for sending a notice advising a contract counterparty that it is party to an Assumable Executory Contract and the Cure Amount related thereto.

4. On June 8, 2009, Unique received the Notice dated June 5, 2009 provided for in the Procedures Order. Pursuant to the Notice, parties have ten days from the date of the Notice to object to the assumption and assignment of any Assumable Executory Contract proposed to be assumed and assigned or to the Cure Amount proposed to be paid with respect thereto.

5. Attached to the Notice is a user identification number and password to be used by Unique on the designated website ("Web Site") to view which contract has been designated an Assumable Executory Contract by the Debtors and the Cure Amount with respect to each such contract.

6. Pursuant to the Web Site, the Assumable Executory Contracts to which Unique is a counterparty ("Unique Contracts") are shown on Exhibit A attached hereto. The Debtors allege that the Cure Amount associated with the Unique Contracts is \$58,370.96.

7. Unique asserts it is owed \$76,359.73 in Cure Amount, due to a difference of \$17,988.77 in the Cure Amounts pertaining to certain of the Unique Contracts, as shown on the spreadsheet attached hereto as Exhibit B.

Objections

8. Unique objects to the Notice on the following grounds:

A. The Unique Contracts cannot be assumed without concurrent cure of all arrearages. "Section 365(b) of the executory contracts section of the [Bankruptcy] Code requires a debtor to cure pre-petition defaults as a precondition of assuming an executory contract." *In re Stoltz*, 315 F3d 80, 86 (2nd Cir. 2002). The pre-petition cure amount alleged by the Debtors to be owed to Unique pursuant to the Unique Contracts is understated by \$17,988.77.

B. The Unique Contracts cannot be assumed or assigned without an adequate showing of future performance. 11 USC § 365(b)(1); *In re Luce Industries, Inc.*, 14 BR 529 (SDNY 1981) (court erred in allowing debtor to assume agreement without assurance by debtor that arrearages would be paid and that debtor could perform). Although adequate assurance of future performance may have been established in the Procedures Motion and other pleadings filed in this case as it relates to VAH, the proposed assignee may not yet even be known, much less is its ability to perform established.

9. Unique reserves its right to amend this Objection to include any additional facts as may be determined by its further investigation of the Notice and Unique Contracts.

10. Any reply to this Objection should be served upon:

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Attorneys for Unique Fabricating, Inc.

Memorandum of Law

11. Because the legal points and authorities upon which Unique relies for purposes of this Objection are incorporated into the Objection, Unique respectfully requests that the Court deem satisfied or, alternatively, waive any requirement of the filing of a separate memorandum of law.

Reservation of Rights

12. Unique reserves the right (a) to amend, supplement, or otherwise modify this Objection and all attachments and exhibits hereto as necessary or proper; and (b) to raise such other and further objections to any proposed assumption and assignment, and/or the Cure Amount with respect to the proposed assumption and assignment of the Unique Contracts.

Conclusion

WHEREFORE, Unique Fabricating, Inc. respectfully requests that the Court enter an Order (a) sustaining this Objection in its entirety and overruling the Notice to the extent it requests relief inconsistent with this Objection, and (b) providing UNIQUE with such other and further relief as is appropriate.

Dated: June 12, 2009
Bingham Farms, Michigan

VERCRUYSSSE MURRAY & CALZONE PC

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EXHIBIT A

Contract Notices

User: J2Q1Kuyy



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Supplier Details

Vendor Master ID: **040584963**

Supplier Name: **UNIQUE FABRICATING INC - PLT 1**
Contract Cure Amount: **\$58,370.96**
of Contracts: **147**

[Click here](#) to view Contract Cure Amount Details

Contracts

Row ID	GM Contract ID	Vendor ID	Counter Party Name	Contract Type	Contract Status
5716-00126396	V024264	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Removed
5716-00337096	06KK0001	40584963	UNIQUE FABRICATING INC	Blanket Order	Noticed
5716-00337097	06KK0002	40584963	UNIQUE FABRICATING INC	Blanket Order	Noticed
5716-00337098	06KK001J	40584963	UNIQUE FABRICATING INC	Blanket Order	Noticed
5716-00337099	06KK001K	40584963	UNIQUE FABRICATING INC	Blanket Order	Noticed
5716-00337102	0FZT0006	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337103	0FZT0007	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337104	0FZT0008	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337105	0FZT0009	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337106	0FZT000B	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337107	0FZT000C	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337108	0FZT000D	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337109	0FZT000F	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337110	0FZT000G	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337111	0FZT000H	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337112	0FZT000J	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337113	0FZT000K	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337114	0FZT000L	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337115	0FZT000R	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337116	0FZT000V	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337117	0FZT000Z	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337118	0FZT0010	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337119	0FZT0011	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337126	BVZ0000J	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337127	BVZ0001J	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337128	BVZ0001N	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337129	BVZ0001P	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337130	BVZ00023	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337131	BVZ00026	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337132	BVZ0002B	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337133	BVZ0002C	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337134	BVZ0002L	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337135	BVZ0002P	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337136	BVZ0002V	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337137	BVZ0002W	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337138	BVZ0002Z	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337139	BVZ00032	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337140	BVZ0003F	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337141	BVZ00043	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337142	BVZ0004F	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337143	BVZ0004G	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337144	BVZ0004W	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00337145	BVZ00050	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00560143	GM41908	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560144	GM51384	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560145	GM51385	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560146	GM51386	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560147	GM51387	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560148	GM51389	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560149	GM51390	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560150	GM51391	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560151	GM51392	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560152	GM51393	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00560153	GM54285	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed

5716-00560154	GM57263	N/A	UNIQUE FABRICATING, INC.	Agreement	Noticed
5716-00565102	GM47190	N/A	UNIQUE FABRICATING INC	Agreement	Noticed
5716-00573761	K16IK001	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00574100	K19ZC001	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00574516	N1MSX000	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00579808	K12LN003	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00579881	K16IK003	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00583284	N1FU7001	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00596426	K1474000	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00604184	K1UMQ000	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00608611	K12LN000	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00612049	N1PGI000	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00623278	K1S8A000	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
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5716-00652868	K1XL1002	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00656129	K192F000	040584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
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5716-00968647	BVZ0003J	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
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5716-00968650	BVZ0003M	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00968651	BVZ0003N	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
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5716-00968653	BVZ0003R	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
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5716-00968660	BVZ00042	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968661	BVZ00046	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968662	BVZ00048	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968663	BVZ00049	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
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5716-00968665	BVZ0004C	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968666	BVZ0004D	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
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5716-00968668	BVZ0004J	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
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5716-00968671	BVZ0004M	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968672	BVZ0004N	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968673	BVZ0004P	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968674	BVZ0004T	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00968675	BVZ0004V	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00968676	BVZ0004X	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968677	BVZ0004Z	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968678	BVZ00051	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968679	BVZ00052	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00968680	BVZ00054	40584963	UNIQUE FABRICATING INC - PLT 1	Blanket Order	Noticed
5716-00968681	BVZ00055	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed
5716-00968682	BVZ00056	40584963	UNIQUE FABRICATING INC - PLT 1	Agreement	Noticed

[Hover mouse cursor here for Contract Status Legend](#)

Important Notices:

All capitalized terms used, but not defined expressly on this website, have the meaning ascribed to such terms in that in the sale motion.

Purchaser's designation of a purchase order as "Noticed" also means that the Purchaser is designating for assumption and assignment all agreements expressly incorporated into and/or referenced in such purchase order.

All contract descriptions that appear in the "Contract ID" field are for purposes of contract identification only and shall not be binding on the Debtors or the Purchaser, as the case may be, or serve as an admission, for any purposes in the debtors' chapter 11 cases, including determining the parties' substantive rights under the contract, establishing the executory nature of a contract or establishing the Debtors' proposed treatment of the contract for purposes of contract assumption and assignment.

Contract Notices

User: J2Q1Kuyy



[My Contracts](#) [Documents & Links](#)

Supplier Details

Vendor Master ID: **040584963**

Supplier Name: UNIQUE FABRICATING INC - PLT 1
Contract Cure Amount: \$58,370.96
of Contracts: 147

[Click here to view Contracts](#)

Cure Amount Details

Remit DUNS	PO Number	BOL	Document Date	Due Date	Amount
RD040584963	PROBVZ0004F	440738	5/5/2009	STAYED	\$468.44 USD
RD040584963	PROBVZ0004H	440739	5/5/2009	STAYED	\$81.48 USD
RD040584963	PROBVZ0004F	440738	5/5/2009	STAYED	(\$468.44) USD
RD040584963	PROBVZ0004H	440739	5/5/2009	STAYED	(\$81.48) USD
RD040584963	PROBVZ0004H	999999999	5/28/2009	STAYED	\$91.42 USD
RD040584963	PROBVZ0002C	440634	5/1/2009	STAYED	\$45.12 USD
RD040584963	PROBVZ0002C	440848	5/6/2009	STAYED	\$45.12 USD
RD040584963	PROBVZ0002C	441645	5/21/2009	STAYED	\$45.12 USD
RD040584963	PROBVZ0002L	441878	5/29/2009	STAYED	\$31.98 USD
RD040584963	PROBVZ0002C	441935	5/28/2009	STAYED	\$45.12 USD
RD040584963	PROBVZ0002C	440634	5/1/2009	STAYED	(\$45.12) USD
RD040584963	PROBVZ0002C	440848	5/6/2009	STAYED	(\$45.12) USD
RD040584963	PROOFZT000K	440678	5/1/2009	STAYED	\$103.92 USD
RD040584963	PROOFZT0006	440678	5/1/2009	STAYED	\$8,907.55 USD
RD040584963	PROOFZT000K	440742	5/4/2009	STAYED	\$207.84 USD
RD040584963	PROOFZT0006	440742	5/4/2009	STAYED	\$8,346.92 USD
RD040584963	PROOFZT000K	440798	5/5/2009	STAYED	\$103.92 USD
RD040584963	PROOFZT0006	440798	5/5/2009	STAYED	\$7,964.72 USD
RD040584963	PROOFZT000K	440851	5/6/2009	STAYED	\$207.84 USD
RD040584963	PROOFZT0006	440851	5/6/2009	STAYED	\$8,462.06 USD
RD040584963	PROOFZT000K	440927	5/7/2009	STAYED	\$103.92 USD
RD040584963	PROOFZT0006	440927	5/7/2009	STAYED	\$7,448.74 USD
RD040584963	PROOFZT000K	441010	5/8/2009	STAYED	\$207.84 USD
RD040584963	PROOFZT0006	441010	5/8/2009	STAYED	\$9,317.64 USD
RD040584963	PROOFZT000K	441804	5/26/2009	STAYED	\$207.84 USD
RD040584963	PROOFZT0006	441804	5/26/2009	STAYED	\$13,061.37 USD
RD040584963	PROOFZT000K	441881	5/27/2009	STAYED	\$103.92 USD
RD040584963	PROOFZT0006	441881	5/27/2009	STAYED	\$5,266.78 USD
RD040584963	PROOFZT000K	441937	5/28/2009	STAYED	\$207.84 USD
RD040584963	PROOFZT0006	441937	5/28/2009	STAYED	\$10,958.85 USD
RD040584963	PROOFZT000K	442009	5/29/2009	STAYED	\$103.92 USD
RD040584963	PROOFZT0006	442009	5/29/2009	STAYED	\$10,208.69 USD
RD040584963	PROOFZT000K	440678	5/1/2009	STAYED	(\$103.92) USD
RD040584963	PROOFZT0006	440678	5/1/2009	STAYED	(\$8,907.55) USD
RD040584963	PROOFZT000K	440742	5/4/2009	STAYED	(\$207.84) USD
RD040584963	PROOFZT0006	440742	5/4/2009	STAYED	(\$8,346.92) USD
RD040584963	PROOFZT000K	440798	5/5/2009	STAYED	(\$103.92) USD
RD040584963	PROOFZT0006	440798	5/5/2009	STAYED	(\$7,964.72) USD
RD040584963	PROOFZT000K	440851	5/6/2009	STAYED	(\$207.84) USD
RD040584963	PROOFZT0006	440851	5/6/2009	STAYED	(\$8,462.06) USD
RD040584963	PROOFZT000K	440927	5/7/2009	STAYED	(\$103.92) USD
RD040584963	PROOFZT0006	440927	5/7/2009	STAYED	(\$7,448.74) USD
RD040584963	PROOFZT000K	441010	5/8/2009	STAYED	(\$207.84) USD
RD040584963	PROOFZT0006	441010	5/8/2009	STAYED	(\$9,317.64) USD
RD040584963	PROCOSTRECV	133895	3/24/2009	STAYED	(\$110.00) USD
RD040584963	PROCOSTRECV	134564	4/3/2009	STAYED	(\$110.00) USD
RD040584963	PROBVZ0002B	440639	5/1/2009	STAYED	\$42.13 USD
RD040584963	PROBVZ0001J	440741	5/4/2009	STAYED	\$168.73 USD
RD040584963	PROBVZ0002B	440796	5/5/2009	STAYED	\$42.13 USD
RD040584963	PROBVZ0002B	440850	5/6/2009	STAYED	\$32.67 USD
RD040584963	PROBVZ0002B	440925	5/7/2009	STAYED	\$55.87 USD
RD040584963	PROBVZ0002B	441008	5/8/2009	STAYED	\$42.13 USD
RD040584963	PROBVZ0001J	441802	5/26/2009	STAYED	\$47.28 USD
RD040584963	PROBVZ0002W	441880	5/27/2009	STAYED	\$13.74 USD

RD040584963	PROBVZ0002B	440639	5/1/2009	STAYED	(\$42.13)	USD
RD040584963	PROBVZ0001J	440741	5/4/2009	STAYED	(\$168.73)	USD
RD040584963	PROBVZ0002B	440796	5/5/2009	STAYED	(\$42.13)	USD
RD040584963	PROBVZ0002B	440850	5/6/2009	STAYED	(\$32.67)	USD
RD040584963	PROBVZ0002B	440925	5/7/2009	STAYED	(\$55.87)	USD
RD040584963	PROBVZ0002B	441008	5/8/2009	STAYED	(\$42.13)	USD
RD040584963	PROBVZ0002Z	440636	5/1/2009	STAYED	\$1,079.06	USD
RD040584963	PROBVZ0002Z	440740	5/4/2009	STAYED	\$1,079.06	USD
RD040584963	PROBVZ0002Z	440795	5/5/2009	STAYED	\$1,079.06	USD
RD040584963	PROBVZ0002Z	440849	5/6/2009	STAYED	\$1,348.83	USD
RD040584963	PROBVZ0002Z	441569	5/20/2009	STAYED	\$1,348.83	USD
RD040584963	PROBVZ0002Z	441646	5/21/2009	STAYED	\$1,079.06	USD
RD040584963	PROBVZ0002Z	441801	5/26/2009	STAYED	\$3,506.96	USD
RD040584963	PROBVZ0002Z	441879	5/27/2009	STAYED	\$1,348.83	USD
RD040584963	PROBVZ0002Z	441936	5/28/2009	STAYED	\$809.30	USD
RD040584963	PROBVZ0002Z	442008	5/29/2009	STAYED	\$1,079.06	USD
RD040584963	PROBVZ0002Z	440636	5/1/2009	STAYED	(\$1,079.06)	USD
RD040584963	PROBVZ0002Z	440740	5/4/2009	STAYED	(\$1,079.06)	USD
RD040584963	PROBVZ0002Z	440795	5/5/2009	STAYED	(\$1,079.06)	USD
RD040584963	PROBVZ0002Z	440849	5/6/2009	STAYED	(\$1,348.83)	USD
RD040584963	PROBVZ0002Z	051809	5/28/2009	STAYED	(\$2.20)	USD
RD040584963	PROBVZ0002Z	052709	5/29/2009	STAYED	(\$2.20)	USD
RD040584963	PROBVZ0001J	440797	5/5/2009	STAYED	\$19.80	USD
RD040584963	PROBVZ0001J	441009	5/8/2009	STAYED	\$19.80	USD
RD040584963	PROBVZ0001J	441803	5/26/2009	STAYED	\$19.80	USD
RD040584963	PRO06KK001K	441648	5/21/2009	STAYED	\$344.16	USD
RD040584963	PROBVZ0001J	440797	5/5/2009	STAYED	(\$19.80)	USD
RD040584963	PROBVZ0001J	441009	5/8/2009	STAYED	(\$19.80)	USD
RD040584963	PROBVX0000H	440633	5/1/2009	07/02/2009	\$263.65	USD
RD040584963	PROBVX0000H	440737	5/4/2009	07/02/2009	\$131.82	USD
RD040584963	PROBVX0000H	440791	5/5/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	440847	5/6/2009	07/02/2009	\$131.82	USD
RD040584963	PROBVX0000H	440922	5/7/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441006	5/8/2009	07/02/2009	\$263.65	USD
RD040584963	PROBVX0000H	441070	5/11/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441128	5/12/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441191	5/13/2009	07/02/2009	\$263.65	USD
RD040584963	PROBVX0000H	441261	5/14/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441502	5/22/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441492	5/19/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441583	5/20/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441584	5/25/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441643	5/21/2009	07/02/2009	\$263.65	USD
RD040584963	PROBVX0000H	441799	5/26/2009	07/02/2009	\$461.38	USD
RD040584963	PROBVX0000H	441877	5/27/2009	07/02/2009	\$197.74	USD
RD040584963	PROBVX0000H	441933	5/28/2009	07/02/2009	\$527.30	USD
RD040584963	PROBVX0000H	442007	5/29/2009	07/02/2009	\$65.91	USD
RD040584963	PROBVX0000M	440792	5/5/2009	07/02/2009	\$65.86	USD
RD040584963	PRO0FJ50000	440923	5/7/2009	07/02/2009	\$396.97	USD
RD040584963	PRO0FJ50000	441262	5/14/2009	07/02/2009	\$1,571.26	USD
RD040584963	PROBVX0000M	441493	5/19/2009	07/02/2009	\$197.58	USD
RD040584963	PROBVX0000M	441800	5/26/2009	07/02/2009	\$263.44	USD
RD040584963	PRO0FJ50000	441644	5/21/2009	07/02/2009	\$1,743.26	USD
RD040584963	GM 41908	000441899	5/27/2009	STAYED	\$6.09	USD
040584963	000123712	15921601S0	5/22/2009	STAYED	\$17.70	USD
040584963	000123712	15921602S0	5/11/2009	STAYED	\$17.70	USD
040584963	000123712	15921601S0	5/15/2009	STAYED	\$17.70	USD
040584963	000123712	15921601S0	5/29/2009	STAYED	\$17.70	USD

Important Notices: All capitalized terms used, but not defined expressly on this website, have the meaning ascribed to such terms in that in the sale motion.

Purchaser's designation of a purchase order as "Noticed" also means that the Purchaser is designating for assumption and assignment all agreements expressly incorporated into and/or referenced in such purchase order.

All contract descriptions that appear in the "Contract ID" field are for purposes of contract identification only and shall not be binding on the Debtors or the Purchaser, as the case may be, or serve as an admission, for any purposes in the debtors' chapter 11 cases, including determining the parties' substantive rights under the contract, establishing the executory nature of a contract or establishing the Debtors' proposed treatment of the contract for purposes of contract assumption and assignment.

EXHIBIT B

GM Contract Cure Amount Objections

Unique Fabricating

Contract ID	Disputed Cure Amount	Correct Cure Amount
0FZT000R	0.00	554.40
0FJ50000	3,711.49	4,060.76
0FJ50001	0.00	575.10
BVZ0004M	0.00	1,350.00
BVZ0004P	0.00	1,500.00
BVZ0004Z	0.00	450.00
BVZ0004X	0.00	2,100.00
BVZ0004C	0.00	1,850.00
BVZ0004N	0.00	1,350.00
BVZ00051	0.00	400.00
BVZ0004D	0.00	3,610.00
BVZ0004J	0.00	1,000.00
BVZ0004L	0.00	2,100.00
BVZ00048	0.00	800.00